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7 Attorneys for Debtors

8 UNITED STATES BANKRUPTCY COURT
9
10 NORTHERN DISTRICT OF CALIFORNIA
11
12 SAN FRANCISCO DIVISION

13 In re

14 JEFFREY K. RODMAN and DOREEN D.

15 RODMAN,

16 Debtors

CHAPTER 13

Case No. 19-31010-DM

**DEBTORS' PARTIAL OPPOSITION TO
MOTION OF LEK SERVICE CORP FOR
RELIEF FROM STAY**

Date: December 3, 2020

Time: 9:00 a.m.

Place: Telephonic Appearance

27 Jeffrey and Doreen Rodman, debtors herein ("Debtors") submit the following partial
28 opposition to the motion of LEK SERVICE CORP ("Lek") for relief from stay ("Motion").

1 1. After the filing of Lek's Motion, Debtors closed a refinance of Lek's loan. Attached
2 hereto as Exhibit "A" is a true and correct copy of the Debtor's refinance Closing Statement showing
3 the full payoff of Lek's secured claim.

4 2. Based upon the attached Closing Statement, the Debtors objected to any waiver of the
5 fourteen-day stay under Bankruptcy Rule 4001(a)(3). The fourteen-day stay will be sufficient to
6 allow all checks from the refinance to clear and for Lek to confirm receipt of full payment prior to
7 the stay terminating. If the stay is waived, and Lek either does not receive its check on December 3
8 or fails to cash it, Debtors are concerned that Lek would be free to notice a Trustee's Sale of the
9 Debtors' home and add the cost of such publication to a revised loan payoff demand with the
10 Chapter 13 Trustee.

11 DATED: December 2, 2020

GOODRICH & ASSOCIATES

12 /s/ Jeffrey J. Goodrich
13 Jeffrey J. Goodrich
14 Attorneys for Debtor
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